REMARKS/ARGUMENTS

Claims 1-24 remain for consideration. The rejections of the claims are traversed in the arguments below.

The Office Action fails to establish that claims 1-24 are unpatentable under 35 USC §103(a) over "Hartmann" (U.S. Patent No. 6,377,955 issued to Hartmann et al.) in view of "Kawano" (U.S. Patent No. 6,341,286 issued to Kawano). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Hartmann with teachings of Kawano, and fails to show that the combination could be made with a reasonable likelihood of success.

The Office Action does not show that the Hartmann-Kawano combination teaches or suggests all the limitations of the claims. For example, claim 1 includes limitations of and related to determining for each report identifier whether the data types of the data elements present in the database satisfy the associated set of requirements.

The cited teachings of Hartmann do not reasonably appear to suggest these limitations. Specifically, the Office Action alleges that Hartmann suggests these limitations at col,. 9, l. 1-2; col. 11, l. 40-42, and col. 15, l. 54-58. However, the text from Hartmann presented below clearly demonstrates that the claim limitations are not suggested. The cited text includes:

> Report generator 208 is configured for generating user-specified reports. For example, users may specify that reports are to be generated on an hourly basis, a daily basis, a weekly basis or a monthly basis. In one embodiment, report generator 208 uses report configuration control information 216 to dynamically determine the report type and the particular format of the report that is to be generated. Thus, by updating the report configuration control information 216, a user may control the type of report that is to be generated, and the particular sampling intervals and data categories that are to be used in generating the report data. (col. 9, l. 1-12)
>
> ...
>
> If integers follow the report identifier, the values of the attribute for that report are to be subcategorized into the buckets. If none follow, then the values of the attribute are to be counted or summed. If the integers are preceded by an equals sign (=), then occurrences of a discrete value are to be counted, rather than being counted in a range of values. (col. 11, l. 40-45)
>
> ...

> At block 708, the report archive data is used to generate user-specified reports dynamically based on a set of user-specified requirements. In one embodiment, a report generator is configured to generate report data based on user-specified report configuration control information. Once generated, the report data can be read and formatted to generate to particular report as required by the user. (col. 15, l. 54-60).

None of these cited teachings in any apparent way suggests determining for which reports a database satisfies the report requirements. An explanation is requested if the rejection is maintained. Otherwise, the rejection should be withdrawn.

The Office Action acknowledges that Hartmann neither teaches nor suggests outputting a set of report identifiers for which the data types of data elements in the database satisfy the associated sets of report requirements, and the cited teachings of Kawano neither teach nor suggest these limitations. The cited teachings of Kawano include:

> These and other objects of the invention are accomplished in accordance with the principles of the invention by providing a method and apparatus for generating and distributing computer output reports which does not require programing, does not require familiarity with database query languages, and does not require access to a database. Unattributed reports and attributed reports are stored in a report warehouse.
>
> Attributed reports are generated from unattributed reports and attributed reports. Exceptions in reports stored in the report warehouse are monitored and selected users are notified. As used herein, an unattributed report comprises report data and an attributed report comprises report data and report structure definitions. (col. 1, l. 64 – col. 2, l. 10)

It can be seen from the cited text that there is no apparent suggestion of any limitations of outputting report identifiers for those particular reports for which the data types of data elements in the database satisfy the associated sets of report requirements. An explanation is requested if the rejection is maintained. Otherwise, the rejection should be withdrawn.

The Office Action does not provide a proper motivation to support combining the teachings of Hartmann and Kawano. The alleged motivation states that it would have been obvious to combine the teachings "wherein report warehouse provided therein (see Kawano's fig. 2, item 20) would incorporate the use of report pool and report definition in the repository, in the same conventional manner as described by Kawano

(coll. 1, lines 65-67 and col. 2, lines 1-10) ... [in order to] ease the process of generating the report without using any command language by using the GUI." This alleged motivation is conclusory and improper.

Hartmann suggests the capability of a user defining "custom reports by modifying report configuration control information, thereby reducing the need for custom report programming." It is respectfully submitted that no evidence is presented to show that Hartmann's approach is in anyway cumbersome. Nor is any evidence presented to show how (or even whether) Hartmann's approach could be improved by Kawano's teachings. Furthermore, it is not apparent how the combination could be made with a reasonable degree of success.

The rejection of claims 1-24 over the Hartmann-Kawano combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success. The following discussion explains the further limitations of the claims that are not shown to be suggested by the Hartmann-Kawano combination.

Claims 2 and 3 depend from claim 1, and the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above for claim 1.

The Office Action does not show that the Hartmann-Kawano combination suggests the limitations of claim 4 of and related to reading the selected data elements from a sequential data file prior to populating the database. The Office Action cites Hartmann's teachings of an displaying error messages to an error log. However, there is no cited teaching that Hartmann reads the error log information and then populates a database in accordance with the other related limitations of claims 1-4. Thus, claim 4 is not shown to be suggested by the Hartmann-Kawano combination.

The Office Action fails to establish that claim 5 is unpatentable over the Hartmann-Kawano combination for at least the reasons set forth above in regards to claim 1. In addition, claim 5 includes limitations of and related to reading selected log records from the log file, storing log data from the selected log records in a relational log-data database, and creating a database content table that indicates the log record types of the selected log records. The cited teachings of Hartmann do not appear to

teach these limitations. For example, there is no showing of a suggestion to create a database content table that indicates the log record types of the selected log records. The teaching cited by the Office Action includes:

> Report generator 208 is a computer, or one or more hardware or software components or processes that cooperate or execute in one or more computer systems. Report generator 208 is configured to read report archive data 212 and to dynamically generate report data 218 based on the particular needs of a user or administrator. In one embodiment, the report data 218 is maintained as a plurality of separate report files based on the particular information that is of interest to the user. In a preferred embodiment, report data 218 is stored as one or more comma-separated-value files (".csv files") to allow the information to be read or imported by other software. In another embodiment, report data 218 is stored in a database system and is accessible by a user through a database application program. (col. 6, l. 49-62)

There is no apparent suggestion of a database content table that indicates log record types of the selected log records. This teaching of Hartmann appears to suggest comma separated report data in a file. It is respectfully noted that those skilled in the art will recognize that the claimed log record type information is not the same as the log data itself, which is stored in the relational database. Thus, the limitations of claim 5 are not shown to be suggested by the Hartmann-Kawano combination.

The Office Action fails to show that the Hartmann-Kawano combination suggests the limitations of claim 6 including, for each log record type of the selected log records, storing log data from the selected log records of the log record type in a respective log data table. Along with the Hartmann's teaching at col. 6, as quoted above, the Office Action cites Hartmann's teaching of:

> The report data 218 can be viewed as a matrix and, in one embodiment, can be implemented in one or more stored matrices or database tables. Each time period within the report (e.g. each hour in a daily report) can be viewed as a row in the matrix. Each customer or user can be viewed as a column in the matrix. Data is accumulated in a row within one time period. When a new time period is processed, the row index is incremented and a new accumulation begins. When a new customer or user is encountered, a new column is added. (col. 16, l. 30-39).

These teachings at columns 6 and 16 contain no apparent suggestion of respective tables according to log record types. While these teachings appear to

generally suggest one or more database tables, it is not apparent how the general teaching of multiple tables suggests the specific claim limitations of a respective database table for each log record type. Further explanation is requested if the rejection is maintained. Otherwise, the rejection should be withdrawn.

Claims 7 and 8 are not shown to be unpatentable over the Hartmann-Kawano combination for at least the reasons set forth above for claim 6.

Claims 9 and 11 depend from claims 8 and 5, respectively, and are patentable over the Hartmann-Kawano combination for at least the reasons set forth above for claims 8 and 5.

Claim 10 depends from claim 9, and claim 12 depends from claim 11. Claims 10 and 12 are patentable over the Hartmann-Kawano combination for at least the reasons set forth above for claims 9 and 11.

Claim 13 includes the limitations of claim 5, along with additional limitations of and related to transmitting the selected log records from the host system to a second data processing system, and converting log data from the selected log records to a format suitable for storage in a relational database and storing the data of the second format in a relational database by the log record types, wherein the selected log records are converted and stored in the relational database at the second data processing system. The Office Action fails to show that Hartmann teaches these limitations.

At the cited col. 20, l. 1-32 of Hartmann, the suggestion is to provide sequences of instructions to a processor via a network. There is no apparent suggestion of transmitting the selected log records from a host system to a second data processing system. Furthermore, the cited teachings of Kawano at col. 1, l. 65-67; col. 2, l. 1-10; col. 4, l. 6-18 generally discuss distributing computer output reports, generating attributed reports from unattributed reports, and converting unattributed reports into attributed reports. There is no apparent suggestion of the claimed transmission of selected log records from a host system to a second data processing system and then the conversion of those log records to relational database storage format and storage at the second data processing system. It is respectfully submitted that the alleged general showing of distributing report data does not reasonably suggest the specifically claimed

transmission of log data records, the particular conversion, and the particular storage at the second data processing system.

For these reasons and the reasons set forth above in regards to claim 1, the Office Action does not show that claim 13 is unpatentable over the Hartmann-Kawano combination.

Claim 14 depends from claim 13 and includes limitations similar to those of claim 6. Thus, for at least the reasons set forth above in response to the rejection of claim 6, claim 14 is not shown to be unpatentable over the Hartmann-Kawano combination.

Claim 15 depends from claim 14 and includes limitations similar to those of claim 7. The Office Action fails to establish that claim 15 is unpatentable over the Hartmann-Kawano combination for at least the reasons set forth above in response to the rejection of claim 7.

Claim 16 includes limitations similar to those of claim 11, and claim 17 includes limitations similar to those of claim 12. Thus, claims 16 and 17 are not shown to be unpatentable over the Hartmann-Kawano combination for at least the reasons set forth above in regards to claims 11 and 12 and the reasons set forth in regards to claim 13 from which claims 16 and 17 depend.

Claim 18 is an apparatus claim in means plus function format and includes limitations similar to those of claim 1. The Office Action does not show that the Hartmann-Kawano combination suggests the functions of claim 18 as explained above for claim 1. Furthermore, the Office Action does not consider the structure (e.g., FIG. 1) disclosed in the specification in alleging that the claims are unpatentable. ("the PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination." *In re Donaldson Co.*, 16 F.3d 1189, 29 USPQ2d 1845 (Fed. Cir. 1994) MPEP 2181). Therefore, claim 18 is not shown to be unpatentable over the Hartmann-Kawano combination.

Claim 19 is also an apparatus claim in means plus function format. The Office Action does not show that the functions of claim 19 are suggested by the Hartmann-Kawano combination for the reasons set forth above for claim 5, and in addition does not show that the Hartmann-Kawano combination suggests the structure disclosed in

the specification. Thus, claim 19 is not shown to be unpatentable over the Hartmann-Kawano combination.

Claim 20 is a system claim that includes the functional limitations described above for claim 13 and further claims the designated functions performed by a host data processing system and a second data processing system. Not only has the Office Action failed to show that the Hartmann-Kawano combination suggests the claimed functions, but the Office Action also fails to show any corresponding data processing systems in the Hartmann-Kawano combination as performing the designated functions. Thus, claim 20 is not shown to be unpatentable over the Hartmann-Kawano combination.

Claim 21 includes limitations of and related to selecting from sets of report information, a set of report identifiers for which the data types of the data elements present in a database satisfy the set of report requirements associated with each report identifier. It is respectfully submitted that none of the cited teachings of Hartmann appears to reasonably suggest these limitations. The Office Action alleges that Hartmann's col. 3, l. 8-58 suggests the limitations. However, there is apparent selection any report identifier based on data types of data elements present in a database. The cited portion of Hartmann appears to generally teach creating and storing report configuration information that defines reports. This is not suggestive of selecting report identifiers based on data types of data elements present in the database. An explanation is requested if the rejection is maintained. Otherwise the rejection should be withdrawn.

Claims 22, 23, and 24 depend from claim 21 and are patentable over the Hartmann-Kawano combination for at least the reasons set forth above.

Withdrawal of the rejection and reconsideration of the claims are respectfully requested. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.032PA).

Respectfully submitted,

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